

Nassau County Department of Social Services
COMPLIANCE WITH NYS AUTOMATED FINGER IMAGING ("AFIS") REQUIREMENTS FOR PUBLIC BENEFITS APPLICANTS
Corrective Action Plan

	RECOMMENDED ACTION	REPORT AUDIT NUMBER	IMPLEMENTATION STATUS
1	DSS should immediately enforce the finger-imaging requirement in the determination of program eligibility as required by State Social Services Law, regulations and directives.	1	Temporary Assistance has always enforced the finger-imaging requirements. The Food Stamp program was not imaging those customers who met federal disability guidelines, and on January 26, 2004, the Department received a formal waiver from the New York State Office of Temporary and Disability Assistance excluding this group. The vast majority of Medicaid applicants are not required to come into the Mineola office, and therefore, are not available to be finger-imaged. Medicaid is finger-imaging those applicants who are actually available to be finger-imaged and do not carry an exempt status. During the period November 1, 2003, thru April 30, 2004, 1,883 Medicaid applicants have been finger-imaged.
2	Internal procedures should be established and documented that incorporate finger imaging into the eligibility determination process for all benefit programs.	1	The Department's procedures are in place and have been since 1995. These procedures have been updated and modified over the years as programs have been added and exemptions approved by the State. Recently, we revised the Finger Imaging Notice for consistency and uniformity of use by all program areas.
3	Training should be provided to all caseworkers on the eligibility requirements and the proper documentation to be included in all case folders.	1	Examiners are fully conversant with the eligibility requirements regarding finger - imaging. It has been reinforced that all Finger Imaging Notices be stored in the case folders.

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4	DSS should prepare an action plan to address the recipients on the WMS/AFIS Reconciliation Report. Where recipients are found to qualify for state-approved exemptions, that conclusion should be documented in the client's file and coded into WMS. All non-exempt recipients should be immediately notified to comply with the finger-imaging requirement to remain eligible for benefits. Finger imaging of these clients should take immediate priority.	2	As a result of the addition of two examiners and two part-time workers, significant improvement has been made on the AFIS Reconciliation Report. Although the audit perceived these as applicants/recipients not captured by finger-imaging, that is not the case. The entry "SS# Exists in AFIS" indicates that there had been finger-imaging activity. Most of the discrepancies were operator error. Training of contract operators by Sajem-Morpho on February 9, 2004, has eliminated most errors. (See Report Comment #1 above.) A mass call-in project was implemented from January 26, 2004, to February 28, 2004. 312 Temporary Assistance clients received letters. All but 71 complied. The latter were closed or deleted from their cases. In Food Stamps there were 1,635 cases reviewed. 1,095 were coded exempt. 303 were called in, 209 complied, and 94 were closed. At the time of the review, 237 were already closed for other reasons.
5	The conflicting data in WMS and AFIS should be investigated and resolved.	2	Completion is ongoing. Two part-time workers have been assigned this task exclusively. Future errors should be considerably reduced as a result of contract operator retraining on February 9, 2004.
6	Caseworkers should be instructed that eligibility determinations cannot be made without an AFIS clearance or a qualified exemption.	2	The examiner's responsibility is to confirm that all required individuals have been finger-imaged or that an appropriate exemption exists. The clearance report may be delayed by imaging errors. These cases are captured via the monthly Aging Status Report sent directly to Special Investigations. Currently, the number of individuals who need to be re-imaged has been reduced from almost 400 at the time of the audit to 65.
7	Management should ensure that future WMS/AFIS Reconciliation Reports are resolved when received to prevent duplicate payment of benefits by Nassau County or another jurisdiction.	2	See Report Comment # 2 above. However, no fraud has been detected from this report. All "hits" have been the result of administrative error.

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8	As a photo identification card is issued as part of the AFIS procedure, DSS should ensure that non-exempt applicants are properly finger-imaged.	3	A photo identification card is not issued as part of the AFIS procedure.
9	DSS should update the internal "Nassau County Finger Imaging Notice" to comply with the state directive by stating that those applying for all public benefits must be imaged. The notification should include the regulatory language that nonexempt individuals who fail to comply with the finger imaging will have their cases closed/denied.	4	Applicants for assistance are first notified regarding the need to be finger imaged in Book 1, LDSS 4148A "What You Should Know About Your Rights and Responsibilities." This is packaged in the common Statewide application #LDSS 2921 which applicants pick up at the receptionist desk when coming in the door. Applicants are given a Finger-Imaging Notice when they hand in their completed application. One of the things the notice states clearly is that "If you refuse to participate in this mandatory program, your public assistance (and food stamps, if applicable) will be denied or terminated. Your medical assistance will also be denied or terminated if you are a single adult or childless couple." Recently, the notice was revised for consistency and uniformity of use by all program areas
10	DSS should notify all new applicants, in writing, of the finger-imaging requirement as part of the application, via the aforementioned notice.	4	This has always been in place. Appropriate language appears on the Finger Imaging Notice (referral) and in the application packet.
11	All employees assigned to the unit for handling AFIS matches and reports should be trained to understand fully the procedures to follow for investigating reported AFIS matches.	5	In October 2002, Quality Assurance and Special Investigation were merged into one unit under one supervisor. Staff has been added to strengthen productivity and increase effectiveness. Personnel have doubled from five to ten. Due to these additions and modifications, all staff received full AFIS training on March 18, 2003, and then again on February 9 and 10, 2004.
12	Written procedures should be adopted and enforced to ensure that investigations are promptly performed.	5	Existing written procedures are in the process of being reviewed and modified.

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13	Case files should contain documentation substantiating the action taken on the AFIS match report.	5	As stated previously in report comment # 2, most discrepancies noted on the Reconciliation Report were operator errors. These discrepancies are corrected in the Special Investigations unit and documented on the report that is filed in the unit. If any action were to be taken as a result of discovering a “true” match, the eligibility unit would be notified and the eligibility worker would make an entry in the comment sheet.